

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MONTVALE SURGICAL CENTER a/s/o
MARK REEVES,

Plaintiffs,

CIVIL ACTION NO.: 12-02478

v.

HORIZON BLUE CROSS BLUE SHIELD OF
NEW JERSEY, INC.; PSE&G; ABC CORP.
(1-10)(Said names being fictitious and
unknown entities)

Defendants.

NOTICE OF MOTION

TO: Andrew R. Bronsnick, Esquire
Massood & Bronsnick LLP
50 Packanack Lake Road East
Wayne, NJ 07470-5834

PLEASE TAKE NOTICE that Defendant Horizon Blue Cross Blue Shield of New Jersey (“Horizon”), by its undersigned counsel, shall move for an Order dismissing Plaintiff’s Complaint before the United States District Court for the District of New Jersey, M.L. King Jr., Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey on June 18, 2012, at 9:00 a.m. or as soon thereafter as counsel may be heard.

In support of this Motion, Defendant Horizon Blue Cross Blue Shield of New Jersey shall rely on the accompanying memorandum of law.

CONNELL FOLEY LLP
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(856) 317-7100

*Attorneys for Defendant
Horizon Blue Cross Blue Shield of New
Jersey*

BY:


Matthew A. Baker, Esquire

DATE: May 17, 2012